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June 19, 2019

VIA ECF

The Honorable Judge Eric N. Vitaliano United States District Court Eastern District of New York (Brooklyn) 225 Cadman Plaza East Brooklyn, NY 11201

> Re: Galan et al v. Segarra et al Case No. 1:18-cv-02603-ENV-JO

Dear Judge Vitaliano:

This office is bankruptcy counsel to the defendants in the above referenced matter. I wish to respectfully inform your Honor that defendants Chiflez Corp. and Cositas Ricas Ecutorianas Corp. (the "Debtors") have filed bankruptcy petitions under Chapter 11 of the United States Bankruptcy Court on June 18, 2019. The Chapter 11 bankruptcy cases have been accorded case number 1-19-43748 and 1-19-43747 respectively. True and correct copies of the Notice of Bankruptcy Case Filings are annexed hereto.

Pursuant to section 362(a) of the Bankruptcy Code, the Debtors' filing of its voluntary petition operates as a stay, applicable to all entities, of, among other things: (a) the commencement or continuation of all judicial administrative, or other actions or proceedings against the Debtors' (i) that were or could have been commenced before the commencement of the Debtors' case, or (ii) to recover any claims against the Debtors that arose before the commencement of the Debtors' case; (b) the enforcement, against the Debtors or against any property of the Debtors' bankruptcy estate, of a judgment obtained before the commencement of the Debtors' case; or (c) any act to obtain possession of property of or from the Debtors' bankruptcy estate, or to exercise control over property of the Debtors' bankruptcy estate.

This letter merely serves the limited purpose of advising the Court and parties below of the aforementioned bankruptcy proceeding. As a result of the stay, no further pleadings or papers will be filed by the undersigned in this action.

Thank you for your consideration of the foregoing.

Respectfully submitted,

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Enclosures.

cc: Plaintiffs' Counsel (VIA ECF)